

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
DAVID ALLEN MCVICKER, SR	:	
aka David Allen McVicker	:	CASE NO. 1:22-bk-01888
STEPHANIE ANN MCVICKER	:	
fka Stephanie Ann Fogle	:	
Debtor(s)	:	
	:	
NATIONSTAR/MR COOPER	:	
Movant	:	
	:	
DAVID ALLEN MCVICKER, SR	:	
aka David Allen McVicker	:	
STEPHANIE ANN MCVICKER	:	
fka Stephanie Ann Fogle	:	
Respondent(s)	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied as stated; the mortgage is being paid through the plan payments and the Debtor's employer made an error with the wage deduction which in turn is causing a delay in the Trustee's ability to disburse funds.
8. The Debtor lacks knowledge or information, such as a pay off statement, sufficient to form a belief as to the truth of this averment, and therefore denies the same.
9. Denied. See response to paragraph 7.
10. Denied. See response to paragraph 7. By way of further answer, the Debtors are only behind a partial payment of \$419.50.
11. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.

12. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

Kara K. Gendron, Esquire
Attorney ID #87577
MOTT & GENDRON LAW
125 State Street
Harrisburg, PA 17101
<http://www.mottgendronlaw.com>
T: (717) 232-6650 | F: (717) 232-0477
karagendron@gmail.com